

1 2 3 4	Robert F. McCauley (SBN 162056) robert.mccauley@finnegan.com Tina E. Hulse (SBN 232936) tina.hulse@finnegan.com Jeffrey D. Smyth (SBN 280665) jeffrey.smyth@finnegan.com Holly Atkinson (SBN 286546)	COOLEY LLP HEIDI L. KEEFE (178960) (hkeefe@cooley.com) DANIEL J. KNAUSS (267414) (dknauss@cooley.com) Five Palo Alto Square 3000 El Camino Real
5	holly.atkinson@finnegan.com FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, LLP	Palo Alto, CA 94306-2155 Telephone: (650) 843-5000 Facsimile: (650) 849-7400
6 7	3300 Hillview Avenue Palo Alto, California 94304 Tel: (650) 849-6600	DENNIS McCOOE (mccooe@blankrome.com)
8	Fax: (650) 849-6666 Attorneys for Plaintiffs ASETEK HOLDINGS, INC.	(admitted <i>Pro Hac Vice</i>) KATHERINE BARECCHIA (barecchia@blankrome.com) (admitted <i>Pro Hac Vice</i>)
10	and ASETEK A/S	JOEL DION (dion-j@blankrome.com) (admitted <i>Pro Hac Vice</i>) BLANK ROME LLP
11 12		One Logan Square 130 North 18 th Street Philadelphia. PA 19103
13		Telephone: (215) 569-5580 Facsimile: (215) 832-5580
14		Attorneys for Defendant COOLIT SYSTEMS INC.
15		
16	UNITED STATES DISTRICT COURT	
17	NORTHERN DISTRICT OF CALIFORNIA	
18	SAN FRANCISCO DIVISION	
19		
20	ASETEK HOLDINGS, INC. and ASETEK A/S,	CASE NO. 3:12-CV-04498-EMC
21	Plaintiffs,	STIPULATED REQUEST TO SEAL COURTROOM DURING SUMMARY
22	v.	JUDGMENT HEARING; [PROPOSED] ORDER
23	COOLIT SYSTEMS INC.,	Date: September 19, 2013
24	Defendant.	Time: 1: 30 p.m . 1:00 p.m. Courtroom: 5, 17 th Floor
25		Judge: Hon. Edward M. Chen
26		
27		

28

Case3:12-cv-04498-EMC Document121 Filed09/09/13 Page2 of 3

The parties to this action hereb	by submit this stipulated request to seal the courtroom	
during the September 19, 2013 hearing regarding Defendant CoolIT Systems, Inc.'s Motion for		
Partial Summary Judgment. The hearing is likely to involve the discussion of certain documents		
that Asetek has produced and designated as Attorneys' Eyes Only under the Protective Order		
because they contain confidential and proprietary information that would subject Asetek and/or		
third parties to competitive injury if it were to become publicly known. In addition, the		
documents include several confidential third-party agreements and correspondence related to		
those agreements, which Asetek is under a contractual obligation to keep confidential.		
Moreover, it is also possible that information that CoolIT has designated Attorney's Eyes Only		
may be discussed during the hearing. Accordingly, the parties respectfully request that, at the		
time of the Summary Judgment Hearing, the Court reserve this matter for last on its calendar and		
seal the Courtroom before any of Asetek's confidential information is disclosed on the record.		
By his signature below, counsel for Plaintiffs attests that counsel for Defendant concurs		
in the filing of this Stipulation.		
Dated: September 9, 2013	FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, LLP	
	By: /s/ Robert F. McCauley Robert F. McCauley	
	Attorneys for Plaintiffs Asetek A/S and Asetek Holdings, Inc.	
Dated: September 9, 2013	BLANK ROME LLP	
	By: /s/ <i>Dennis P. McCooe</i> Dennis P. McCooe	
	Dennis P. McCooe	
	Attorneys for Defendant CoolIT Systems, Inc.	

[PROPOSED] ORDER

PURSUANT TO STIPULATION OF THE PARTIES, the Stipulation is GRANTED.

IT IS SO ORDERED.

Dated: ____

9/9/13

The hearing time is reset for 1:00 p.m. on 9/19/13.

Counsel must appear before 1:00 p.m.

